

Mario N. Alioto (56433)  
Lauren C. Capurro (241151)  
**TRUMP, ALIOTO, TRUMP & PRESCOTT LLP**  
2280 Union Street  
San Francisco, CA 94123  
Telephone: (415) 563-7200  
Facsimile: (415) 346-0679  
malioto@tatp.com  
lauren russell@tatp.com

*Lead Counsel for Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No.: 4:07-cv-05944-JST  
Case No. 4:13-cv-03234-JST

MDL No. 1917

This Document Relates to:  
All Indirect Purchaser Actions

**DECLARATION OF LAUREN C.  
CAPURRO IN SUPPORT OF  
INDIRECT PURCHASER  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5(d)**

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to  
3 practice before this Court. I am a partner at the law firm Trump, Alioto, Trump & Prescott,  
4 LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in  
5 the above-captioned action.

6 2. I make this declaration in support of the IPPs’ Administrative Motion to  
7 File Under Seal Pursuant to Civ. L. R. 7-11 and 79-5(d). The matters set forth herein are  
8 within my personal knowledge and if called upon and sworn as a witness I could  
9 competently testify regarding them.

10 3. I have reviewed and complied with this Court’s Standing Order Governing  
11 Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar,  
12 dated March 19, 2019.

13 4. I have reviewed and complied with Civil Local Rule 79-5.

14 5. On June 18, 2008, the Court approved a “Stipulated Protective Order” in  
15 this matter (ECF No. 306, amended at ECF No. 1142) (the “Protective Order”).

16 6. Section 10 of the Protective Order requires that “a Party may not file in the  
17 public record in this action any Protected Material. A Party that seeks to file under seal  
18 any Protected Material must comply with Civil Local Rule 79-5.”

19 7. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), IPPs  
20 seek to file the gray highlighted portions of IPPs’ proposed Second Amended Class Action  
21 Complaint Against Thomson and TDA Defendants under seal. The proposed redactions in  
22 the Second Amended Class Action Complaint are identical to the redactions previously  
23 ordered for the First Amended Class Action Complaint. *See* ECF No. 3882 (order granting  
24 motion to file portions of First Amended Class Action Complaint under seal). IPPs have  
25 maintained those allegations as confidential throughout this litigation.

26 8. The documents or portions of documents that IPPs seek to file under seal  
27 contain either (a) material designated by certain Defendants pursuant to the Stipulated  
28 Protective Order as “Confidential” or “Highly Confidential” or (b) analysis of, references

1 to, or information taken directly from material designated by certain Defendants pursuant  
2 to the Stipulated Protective Order as “Confidential” or “Highly Confidential.”

3 9. The entities that have designated the materials referred to in the gray  
4 highlighted portions of the proposed Second Amended Class Action Complaint as  
5 confidential or highly confidential are: MT Picture Display Co., Ltd., Thomson SA (now  
6 known as Technicolor SA), Thomson Consumer Electronics, Inc. (now known as  
7 Technicolor USA, Inc.), Technologies Displays Americas, LLC, Chunghwa Picture Tubes,  
8 Ltd., Samsung SDI Co., Ltd., Koninklijke Philips Electronics B.V., and Toshiba  
9 Corporation.

10  
11 I declare under penalty of perjury under the laws of the United States that the  
12 foregoing is true and correct. Executed this 13th day of September, 2019 at San Francisco,  
13 California.

14 /s/ Lauren C. Capurro  
15 Lauren C. Capurro  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28